IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	**Case No.: 2:06cr228-CSC**
	)	
RENEE N. SHOUP	)	

UNOPPOSED MOTION TO CONTINUE TRIAL

NOW COMES the Defendant, Renee A. Shoup, by and through the undersigned counsel, Michael J. Petersen, and respectfully moves this Court to reset the above-referenced matter now scheduled for trial on the March 12, 2007 misdemeanor trial docket to allow for the completion of the pretrial diversion report in this matter.

In support of this Motion, defendant would show:

1. Undersigned counsel requested Pretrial Diversion for Defendant on November 16, 2006.

2. The United States Attorney's office has forwarded the request for Pretrial Diversion to the United States Probation Office.

3. The defendant has met with the United States Probation Office's Pre-trial Services Officer assigned to the above-stated matter.

4. The United States Probation Office is currently preparing the Probation Officer's report on the Pretrial Diversion request. Undersigned counsel is of the information and belief that said report will not be completed prior to the date now set for the trial of the above matter.

5. Undersigned counsel has communicated with the United States Attorney in this matter and the government does not oppose a continuance.

6. Should the Court grant this Motion, the parties expect the matter to be resolved prior

to the next trial docket. This matter has been continued once previously.

WHEREFORE, defendant respectfully requests that this Motion be granted and the trial now set on the March 12, 2007 misdemeanor trial docket be continued to the next misdemeanor trial docket.

Dated this the 2nd day of March 2007.

/s/ Michael J. Petersen
MICHAEL J. PETERSEN
Assistant Federal Defender
201 Monroe Street, Suite 407
Montgomery, Alabama 36104
Phone: (334) 834-2099
Fax: (334) 834-0353
E-mail: michael_petersen@fd.org
ASB-5072-E48M

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	**Case No.: 2:06cr228-CSC**
	)	
RENEE N. SHOUP	)	

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Kent Brunson, AUSA
One Court Square, Suite 201
Montgomery, AL 36014

Neal B. Frazier, Special AUSA
42 ABW/JA
50 LeMay Plaza South
Maxwell AFB, AL 36112

Respectfully submitted,

s/ Michael J. Petersen
MICHAEL J. PETERSEN
Assistant Federal Defender
201 Monroe Street, Suite 407
Montgomery, Alabama 36104
Phone: (334) 834-2099
Fax: (334) 834-0353
E-mail: michael_petersen@fd.org
ASB-5072-E48M